

FILED
7/11/2024

VJD

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

VIRGIL GIBSON

Case No.

Violations: Title 18, United States
Code, Sections 924(c)(1)(A), 1951(a),
2119, 1201(a)(1)

COUNT ONE

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 7, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, with intent to cause death and serious bodily harm, took a motor
vehicle, namely, a 2009 Chevrolet Malibu, that had been transported, shipped, and
received in interstate commerce, from the person and presence of Victim A by force,
violence, and intimidation;

In violation of Title 18, United States Code, Section 2119.

COUNT TWO

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 7, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which he may be prosecuted in a court of the United States,
namely, carjacking in violation of Title 18, United States Code, Section 2119, as
charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 8, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2022 Kia K5, that had been transported, shipped, and received in interstate commerce, from the person and presence of Victim B by force, violence, and intimidation;

In violation of Title 18, United States Code, Section 2119.

COUNT FOUR

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 8, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which he may be prosecuted in a court of the United States,
namely, carjacking in violation of Title 18, United States Code, Section 2119, as
charged in Count Three of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 8, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce by robbery, in that the defendant did unlawfully take and obtain a wire transfer of money from the person and presence of Victim B at approximately East 79th St and South Ingleside Avenue in Chicago, Illinois, against Victim B’s will, by means of actual and threatened force, and fear of injury to Victim B;

In violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 8, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, Hobbs Act robbery in violation of Title 18, United States Code, Section 1951(a), as charged in Count Five of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN

The SPECIAL JANUARY 2023 GRAND JURY charges:

On or about April 8, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

VIRGIL GIBSON,

defendant herein, did unlawfully and willfully seize, confine, kidnap, abduct, carry away, and transport Victim B using an instrumentality of interstate commerce, namely, a 2022 Kia K5, and did seize Victim B without his consent for purposes of robbery and otherwise;

In violation of Title 18, United States Code, Section 1201(a)(1).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY